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Adam Laxalt and Joe Prieto*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JOHN QUINTERO,  
Plaintiff,

vs.

CONNIE BISBEE, et al.,  
Defendants.

Case No. 3:16-cv-00673-MMD-CBC

**MOTION FOR EXTENSION OF TIME TO  
FILE RESPONSIVE PLEADING (ECF No. 56)**

Defendants, Adam Laxalt and Joe Prieto (Defendants), by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Ian Carr, Deputy Attorney General, hereby submit their Motion for Extension of Time to File a Responsive Pleading (First Request). This Motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and pleadings on file in this action.

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. ARGUMENT**

Defendants respectfully request a thirty (30) day extension of time out from the current deadline (February 21, 2019) to file a responsive pleading in this case. Counsel for Defendants is confronted with numerous competing deadlines and a high workload due to staffing changes in the Office of the Attorney General. Furthermore, defense counsel has a jury trial before United States Senior District Judge Robert C. Jones scheduled to begin on Monday, February 25, 2019 in the case of *Peters v. Cox*, 3:15-cv-00472-RCJ-CBC. The trial is anticipated to last four to five days, not including deliberations.

1 However, such obstacles are currently being resolved and the requested extension of time should afford  
2 Defendants adequate time to file a responsive pleading in this case.

3 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

4 When an act may or must be done within a specified time, the court may,  
5 for good cause, extend the time: (A) with or without motion or notice if  
6 the court acts, or if a request is made, before the original time or its  
7 extension expires; or (B) on motion made after the time has expired if the  
8 party failed to act because of excusable neglect.

9 Defendants' request is timely and its limited nature will not hinder or prejudice Plaintiff's case,  
10 but will allow for a thorough responsive pleading to Plaintiff's allegations. The requested thirty (30)  
11 day extension of time should permit Defendants time to adequately research and respond to Plaintiff's  
12 allegations. Defendants assert that the requisite good cause is present to warrant the requested  
13 extension of time.

14 For these reasons, Defendants respectfully request a thirty (30) day<sup>1</sup> extension of time from the  
15 current deadline to file a responsive pleading in this case, with a new deadline to and including  
16 Monday, March 25, 2019.


17 DATED this 21st day of February, 2019.

18 AARON D. FORD  
19 Attorney General

20 By: 

21 IAN E. CARR  
22 Deputy Attorney General  
23 State of Nevada  
24 Bureau of Litigation  
25 Public Safety Division  
26 *Attorneys for Defendants*

27 IT IS SO ORDERED.

28   
U.S. MAGISTRATE JUDGE  
DATED: 2/25/2019

<sup>1</sup> Due to the 30-day period falling on a weekend, the deadline is pushed to the next business day. See FED. R. CIV. P. 6(a)(1)(C).

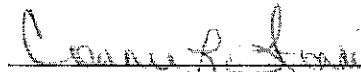
**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on February 21, 2019, I caused to be served a copy of the foregoing, **MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING (ECF No. 56)**, by depositing for mailing via the U.S. Postal Service, to the following:

John Quintero #93782  
Warm Springs Correctional Center (WSCC)  
P.O. Box 7007  
Carson City, NV 89701

Furthermore, the following parties registered with this Court's CM/ECF system will be served electronically:

Kathleen Brady  
Deputy Attorney General  
555 Wright Way  
Carson City, NV 89711  
[kbrady@ag.nv.gov](mailto:kbrady@ag.nv.gov)

  
An employee of the  
Office of the Attorney General